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November 9, 2020

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**VIA ECF & CERTIFIED MAIL**

The Honorable Margo K. Brodie  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: ***Abruzzo Docg Inc., et al. v. Acceptance Indemnity Ins. Co. et al.***, No. 1:20-cv-04160  
(MKB) (JO) (E.D.N.Y.)

Dear Judge Brodie:

We represent Plaintiffs in the above-referenced action. Pursuant to Rules 1(D) and 3(D) of your Individual Practices and Rules, we enclose courtesy copies of Plaintiffs' fully-briefed Motion to Remand, including copies of the moving, opposition, and reply briefs, and all exhibits thereto, as filed on ECF. The documents in this package are as follows:

- Plaintiffs' Notice of Motion to Remand (ECF No. 148)
- Memorandum of Law in Support of Plaintiffs' Motion to Remand (ECF No. 148-1)
- [Proposed] Order Granting Plaintiffs' Motion to Remand (ECF No. 148-2)
- Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion to Remand (ECF No. 150) and related filings:
  - Exhibit A to Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion to Remand (ECF No. 150-1)
  - Defendant Admiral Indemnity Insurance Company's Joinder in Opposition to Remand (ECF No. 150-2)
  - Notice of Joinder in Opposition to Plaintiffs' Motion to Remand by Defendants Argo Managing Agency Limited, Brit Syndicates Limited, Catlin Underwriting Agencies Limited, Liberty Managing Agency Limited, and Tokio Marine-Kiln Syndicates Limited (ECF No 150-3)
  - Defendant Arch Insurance Company's Joinder in Memorandum in Opposition to Plaintiffs' Motion to Remand and Request for Limited Discovery (ECF No. 150-4)
  - Defendant Arch Specialty Insurance Company's Joinder to Acceptance Indemnity Insurance Company's Brief in Opposition to Plaintiffs' Motion to Remand (ECF No. 150-5)
    - Exhibit 1: Declaration of Isabella Stankowski-Booker in Support of Defendant Arch Specialty Insurance Company's Joinder to Acceptance

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Indemnity Insurance Company's Brief in Opposition to Plaintiffs' Motion to Remand (ECF No. 150-6)

- Exhibits A-D to Stankowski-Booker Declaration (ECF Nos. 150-7 through 150-10)
- Defendant Axis Insurance Company's Joinder in Defendants' Motion to Sever and Opposition to Plaintiffs' Motion to Remand (ECF No. 150-11)
- Joinder of Defendants Chubb Custom Insurance Company and Indemnity Insurance Company of North America to Defendant Acceptance Indemnity Insurance Company's Opposition to Plaintiffs' Motion to Remand (ECF No. 150-12)
- Defendant First Mercury Insurance Company's Joinder in Defendants' Motion to Sever and Opposition to Plaintiffs' Motion to Remand (ECF No. 150-13)
- Defendant Greenwich Insurance Company's Joinder to Acceptance Indemnity Insurance Company's Memorandum of Law in Opposition to Plaintiffs' Motion to Remand (ECF No. 150-14)
- Defendant Hartford Fire Insurance Company's Joinder in Opposition to Motion to Remand and Motion to Sever (ECF No. 150-15)
- Defendant HDI Global Insurance Company's Joinder with Defendants' Opposition to Plaintiffs' Motion to Remand (ECF No. 150-16)
- Notice of Joinder in Opposition to Plaintiff's Motion to Remand by Defendants Lexington Insurance Company and Western World Insurance Company (ECF No. 150-17)
- Defendant Liberty Mutual Fire Insurance Company's Joinder in Defendants' Opposition to Plaintiffs' Motion to Remand (ECF No. 150-18)
- Defendant Metropolitan Property and Casualty Insurance Company's Joinder in Opposition to Remand (ECF No. 150-19)
- Defendant Ohio Security Insurance Company's Joinder in Defendants' Opposition to Plaintiffs' Motion to Remand (ECF No. 150-20)
- Supplemental Brief by Scottsdale Insurance Company in Opposition to Plaintiffs' Motion to Remand, and in Support of Its Motion to Sever (ECF No. 150-21)
- Defendant Seneca Insurance Company's Joinder to and Notice of Motion Sever Pursuant to Fed. R. Civ. P. 21 and Joinder in Opposition to Plaintiffs' Motion to Remand (ECF No. 150-22)
- Defendant Sentinel Insurance Company, Ltd.'s Joinder in Opposition to Motion to Remand and Motion to Sever (ECF No. 150-23)
- Defendant Sompo America Insurance Company's Joinder with and Supplement to Defendants' Opposition to Plaintiffs' Motion to Remand (ECF No. 150-24)
- Defendant Travelers Casualty Insurance Company of America's Joinder in Opposition to Remand (ECF No. 150-25)
- Defendant Travelers Excess and Surplus Lines Company's Joinder in Opposition to Remand (ECF No. 150-26)
- Defendant Twin City Fire Insurance Company's Joinder in Opposition to Motion to Remand and Motion to Sever (ECF No. 150-27)
- Defendant United National Insurance Company's Joinder in Opposition to Plaintiffs' Motion to Remand (ECF No. 150-28)

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- Defendants United Specialty Insurance Company's and National Fire and Marine Insurance Company's Motion to Join Co-Defendants' Opposition to Plaintiff's Motion to Remand and Motion to Sever with respect to Claims Made by Stout, Inc. (ECF No. 150-29)
- Defendant Watford Specialty Insurance Company's Joinder in Memorandum in Opposition to Plaintiffs' Motion to Remand (ECF No. 150-30)
- Defendant XL Insurance America's Joinder to Acceptance Indemnity Insurance Company's Memorandum of Law in Opposition to Plaintiffs' Motion to Remand (ECF No. 150-31)
- Memorandum of Law in Opposition to Defendants' Motions to Sever and in Further Support of Plaintiffs' Motion to Remand (ECF No. 151)
- Affirmation of Michael W. Ross in Support of Plaintiffs' Memorandum of Law in Opposition to Defendants' Motions to Sever and in Further Support of Plaintiffs' Motion to Remand (ECF No. 151-1), including Exhibit A (ECF No. 151-2) and Exhibit B (ECF No. 151-3)

We are filing a copy of this letter on ECF per your Individual Practices and Rules.

Respectfully yours,

/s/ Jeremy M. Creelan  
Jeremy M. Creelan

Enclosures

cc: Honorable James Orenstein (via ECF—Without Enclosures)

Counsel of record (via ECF—Without Enclosures)

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